

Exhibit 526

MAYER • BROWN

Mayer Brown LLP
71 South Wacker Drive
Chicago, Illinois 60606-4637

Main Tel +1 312 782 0600
Main Fax +1 312 701 7711
www.mayerbrown.com

Matthew D. Provance
Direct Tel +1 312 701 8598
Direct Fax +1 312 706 9397
mprovance@mayerbrown.com

October 26, 2018

By E-MAIL

Michael N. Nemelka
KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.
1615 M Street, N.W., Suite 400
Washington, D.C. 60036

Re: *In re Dealer Management Systems Antitrust Litig.*,
MDL No. 2817, Case No. 18-CV-864 (N.D. Ill.)

Dear Mike:

I write in follow-up to our last correspondence regarding search terms and custodians for Computerized Vehicle Registration (“CVR”). As it currently stands, we understand that MVSC proposes nine custodians for CVR, and CVR has agreed to four of those custodians, which are indicated in bold, below. In addition, no documents or data are available for Rick Francis, as we previously advised. *See* 06/12/2018 Ltr. at 4 n.8.

1. **Jim Quinlan**
2. **Janet Michaels**
3. **Jason Bonifay**
4. Scott Dudley
5. Jim Negrette
6. ~~Rick Francis~~
7. John Roeder
8. Mark Kithcart
9. **Scott Herbers¹**

In the spirit of compromise, CVR is willing to add two additional custodians, Scott Dudley and Mark Kithcart, for a total of six. We believe that CVR has strong arguments that more than six custodians is excessive and not proportional to the needs of the case, in light of the size of its organization, the scope of the allegations against CVR in the *MVSC* litigation, and the fact that it is reasonable to expect that any relevant custodial documents are likely to be found within the files of already agreed-to custodians.

¹ Contrary to the suggestion in your September 18 letter, Mr. Herbers is not a “freebie” CVR custodian simply because CDK agreed, at Plaintiffs’ request, to make him a CDK custodian. We made clear that Mr. Herbers was being added a custodian “in his CDK capacity” only. 06/29/2018 Ltr. at 2. If you want him for the period that he was affiliated with CVR and you want to run CVR-related search terms across his ESI, then he will count as a CVR custodian.

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We are currently testing MVSC's proposed search terms for CVR and will be in a position to respond substantively to that proposal once the parties reach agreement on custodians, which hopefully we are now close to doing. Per your suggestion, we are available on Monday at 10:00 a.m. (Central) to further meet-and-confer.

Sincerely,

/s/ Matthew D. Provance
Matthew D. Provance

cc: Lead MDL Plaintiff Counsel of Record
Reynolds Counsel of Record
Mark Ryan
Britt Miller
Andrew Marovitz